

Below are comments from August 2000, which remain my comments today.

>Date: Sat, 26 Aug 2000 10:09:08 -0700

>To: Maria.Peeler@wadnr.gov

>From: George Dyson <gdyson@cc.wvu.edu>

>Subject: Bellingham Bay Pilot Plan

>Cc: Robyn du Pre <waters@re-sources.org>

>

>

>Ms. Maria Peeler

>DNR Aquatic Resources Division

>

>Dear Ms. Peeler:

>

>I was one of the citizen observers who attended the Bellingham Bay Pilot

>Team meeting on August 24. I commend you for your reasonable defense of

>DNR's position, which is not at all adversarial to the stated goals of the

>project as a whole.

>

>As a private individual and owner of property adjacent to the Whatcom

>Creek Waterway I have no particular standing in this process other than an

>interest in seeing the cleanup issue resolved. I take this opportunity to

>point out the obvious, in the event that after all the years of

>discussions the following alternative has not been addressed:

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>Sooner or later one of two things is going to happen to G-P's Bellingham

>operations. They are going to either a) drastically clean up their process

>and effluent stream, or b) shut down.

>

>In either event (and it could be soon, in Bay Pilot years) G-P's effluent

>treatment lagoon (approx 30 acres, officially the Aerated Stabilization

>Basin) will become a complete dinosaur (as it is already, in fact, since

>technologies exist to prevent what the basin is attempting, after the fact

>and with limited success, to correct).

>

>This is the place to put the contaminated sediments. They can be isolated

>and capped, and the area reclaimed as the spectacular waterfront that it

>should be. This alternative is preferable to moving toxic sediments around

>the bay, and cheaper than finding a place for them upland. G-P could

>probably *make* money on this alternative, by lowering their liability and

>disposal costs, and then selling the property back to the city or the
>port, if the containment is done so the land can get at least a clean bill
>of health as open space.

>

>Moving these sediments more than once is environmentally and economically
>unsound, and telling the public that treatment options are going to become
>less expensive or more available in the future is a fraud.

>

>Much as I would like to see the project immediately move forward, I urge
>you and DNR to hold your ground. The worst of the contaminated sediments
>should be removed from the bay (and the log pond, which is part of the
>bay) or left as is for the time being, not shuffled around. A reasonable,
>affordable solution exists that could benefit all parties concerned. We
>are going to look pretty foolish if we spend untold millions moving
>sediment around the bay, and then the mill cleans up or closes, leaving us
>wondering what to do with that ASB lagoon. 400,000 yards of sediment would
>fill about 6 feet of the lagoon, leaving ample room for containment and
>capping that would solve this problem once and for all.

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>

>Yours sincerely,

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>

>George Dyson

Response to Mr. George Dyson

1) Comment noted.

FRIENDS OF WHATCOM COUNTY

CLEAN LAND, AIR, WATER, GOOD GOVERNMENT AND A HEALTHY ECONOMY
PO Box 2237, Bellingham, WA 98227 ~ 360.676.1211 ~ www.friendsofwhatcom.com

04/24/02

Lucy McInerney, Site Manager
Department of Ecology
Northwest Regional Office
3190 160th Ave. S.E.
Bellevue, WA 98008

REF: Draft Supplemental Feasibility Study for the Whatcom Waterway Site & Draft
Supplemental Environmental Impact Statement for the Bellingham Bay Comprehensive Strategy

Dear Ms. McInerney,

1 Thank you for this opportunity to participate in the review of this modification of Georgia-Pacific's "Preferred Integrated Near-Term Remedial Action" and the above referenced documents. Many of the following comments apply to both documents. In general, we believe the problem has not been adequately studied, that the conclusions are premature and that the proposal does not fully comply with many regulatory requirements, including but not limited to various RCWs and WACs, MCTA, CERCLA, RCRA, CWA, CAA, ESA and the recently adopted S.522, also known as the "Beach Bill".

2 Generally we consider the waterfront, especially in our City Center and located on the rainy west slope, to be the worst possible place to dispose of toxic sludge and sediments. Suitable disposal facilities should be inland and in more arid locations. The waterfront is a harsh environment subject to erosion and physical distress, as from storm tossed logs. The goal of preventing entry of toxic materials into public waters is compromised by putting containment facilities on the shoreline.

3 Initially, we consider the dredging as unsupportable. The environmental risks of the proposed program should theoretically be balanced against a need to sustain commerce and trade. An economically viable trade or commerce that requires dredging the waterway should be demonstrated in comparison to a detailed analysis of the environmental costs and benefits of dredging vs. not dredging. Otherwise the risks are too great. A more detailed Natural Resource
4 Damage Assessment should be prepared.

5 Alternate uses of the ASB should be evaluated. With scarce waterfront resources, the best interests of the community at large should be taken into consideration. The ASB is down gradient from the bulk of Bellingham's population. There may be no better location for a future storm water treatment facility. This potential use was not examined. Also, the existing shore
6 protections may be most economically productive through conversion to another recreational boat basin. If most of the lagoon's capacity is no longer needed, then the alternative that G-P dredge, treat, transport and dispose of contaminated sediments located therein should also be studied, and the relevant information and analysis disclosed. If this modification is justified simply by the recent availability of the ASB as a CDF, then the alternative for shipping to existing approved facilities should also be reconsidered in view of recent landfill price reductions. A real approved facility offers far better protection from hazards to human health and the environment.

7

There has been no mass balance accounting of the estimated 600 or more tons of mercury used in G-P's chlor-alkali process. Therefore, the public has only projections based on minimal sampling to gauge the risk of local disposal. None of the project documentation has considered the risks of potential mercury vapor flux from dredging, CADs, CDFs, capping, etc., or compared it to no action alternatives. Indeed, in a letter to Richard Grout (D.O.E.) dated 12/19/01, a number of questions regarding mercury vapor monitoring were asked. The letter has so far gone unanswered. Mercury vapor monitors should be established both up and down wind of the site. Time is needed to establish a baseline correlated with air temperature, wind speed and direction. Dredge and disposal tests should be monitored for mercury flux, including the effectiveness of capping as a means of containing mercury vapors. The danger of these vapors, methylated in anaerobic sediments has not yet been assessed in any way.

8

A number of other compounds have not been adequately considered in the assessment. A wide range of PBTs and carcinogens are known or suspected to have been released from G-P over the years. G-P's history of illegal dumping should suggest a broader field of investigation (Please see attached exhibits). The presence of a thick layer of suspended lignin/pulp slurry over much of the bay has so far been ignored. The EPA found G-P to be producing inordinately high levels of organochlorines – up to 100 times higher than other mills. No attempt has apparently been made to assess the significance of this slurry as a vehicle for dioxins and especially furans. Also, the hydrogen sulfide odor produced by this slurry is a nuisance from Little Squalicum beach to Fairhaven, often quite overpowering at Boulevard Park during low tide. This nuisance and the BOD imposed on the bay have not been adequately addressed. The assessment does not consider the presence of hexavalent and tri-valent chromiums that documents indicate may also be present.

9

We are especially concerned with the integrity of the ASB. G-P's seepage monitoring should be independently verified. Double samples should be made available for public scrutiny. The soupy organic layer underlying the site is a risk that may require a high density PVC liner to overcome. The clay liner cannot be trusted to withstand the loads from the proposed action, or to stand up over time. The overburden of dredged sediments could force the clay liner and mercury-laden materials already resident in the lagoon underneath the berm, especially into the waterway, where invert elevations compromise buttressing of the berm's foundation. The soupy underlying layer makes seismic integrity of the berm especially suspect, especially where existing eelgrass beds make buttressing impossible.

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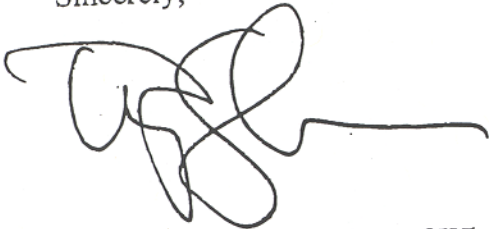
The study completely fails to consider the ASB's vulnerability to storm events associated with meteorological variability and sea level rises predicted to accompany global warming. Even according to conservative EPA estimates, the facility could require extensive fortification over the next 100 years to prevent catastrophic failure. That could be a large unanticipated public cost. There is no more rugged, erosive environment than the seashore, especially considering long fetch for prevailing winds and shallow wave approach this location suffers. Failure of the facility would be a disaster proportional to the toxicity of material, a factor we consider to be virtually unknown at this time.

11

After 40 years of excessive pollution and violations from G-P, Bellingham deserves a permanent clean-up such as removal and disposal at the Arlington or Roosevelt landfills. Selling our City Center waterfront short and having Bellingham foot the bill for disposal of the wastes compromises citizens today, generations to come and the environment at large. Treatment and

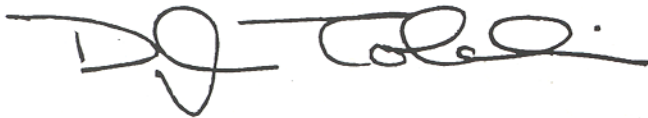
disposal options should be more carefully considered. Cost should be a minor factor in making the decision.

Sincerely,

A handwritten signature in black ink, appearing to be 'Tip Johnson', with a long horizontal line extending to the right.

Tip Johnson - for Friends of Whatcom County and as an individual

Also signed and submitted by:

A handwritten signature in black ink, appearing to be 'Douglas Tolchin', with a long horizontal line extending to the right.

Douglas Tolchin - both as an individual and as President of River Oak Properties

Attached:

- USEPA Paper Industry Cooperative Dioxin Study
- List of toxins known to have been released by G-P (We presume air emissions are deposited and cycled to public waters)
- Memorandum noting G-P's use of chromium compounds